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Attorneys for Defendant

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

STANLEY T MILLER,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No.10-04921 (CGM)

NOTICE OF DEFENDANT'S CROSS-MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Defendant's Memorandum in Support of Defendant's Cross-Motion for Summary Judgment and in Opposition to Trustee's Motion for Summary Judgment, Defendant's Statement of Material Facts Pursuant to Fed. R. Civ. P. 56, Fed R. Bankr. P. 7056 and Local Rule 7056-1, Declaration of Arthur H. Ruegger in Opposition to Trustee's Motion for Summary Judgment for Prejudgment Interest sworn to on May 12, 2021 with all exhibits annexed thereto and Defendant's Objections, Responses And Counterstatements In Opposition To The Trustee's Statement Of Material Facts Pursuant To Fed. R. Civ. P. 56, Fed. R. Bankr. P. 7056 And Local Rule 7056-1, and upon all the prior pleadings and proceedings herein, Stanley T. Miller, (the "Defendant"), by and through his counsel, moves this Court, before the Honorable Cecelia G. Morris, United States Bankruptcy Chief Judge for the Southern District of New York, at the United States Bankruptcy Court for the Southern District of New York, 355 Main Street, Poughkeepsie, New York 12601, for an order granting the Defendant's Motion for Summary Judgment pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure and Rule 56 of the Federal Rules of Civil Procedure and denying the Motion for Summary Judgment filed by Irving H. Picard as Trustee for the Liquidation of Bernard L Madoff Investment Securities LLC, together with such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the Trustees's opposition to Defendant's Cross-Motion shall be served and filed on or before May 26, 2021, and Defendant's reply shall be

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served and filed on or before June 2, 2021. The hearing on the parties' cross-motions shall take place on June 16, 2021.

Dated: May 12, 2021
New York, New York

Respectfully submitted,

DENTONS US LLP

By: /s/ Arthur H. Ruegger
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